

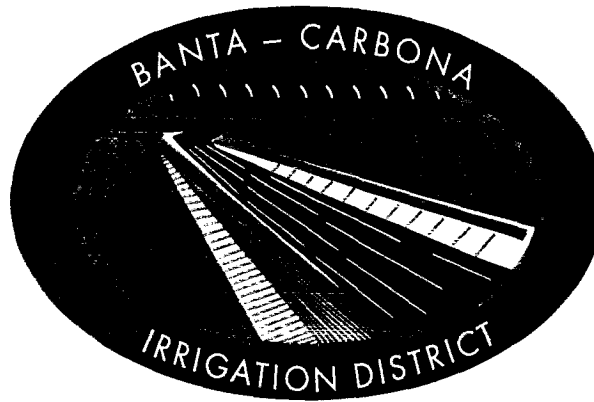
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June 30, 1998

Att: EIS/EIR COMMENTS
CALFED Bay-Delta Program
1416 Ninth Street, Room 252-34
Sacramento, California 95814

**Re: Comments on the Draft Programmatic Environmental Impact Statement/
Environmental Impact Report for the CALFED Bay-Delta Program.**

This letter represents the comments of the Banta-Carbona Irrigation District (BCID) on the March 1998 Draft Programmatic EIS/EIR for the CALFED Bay-Delta Program. BCID serves the needs of seventeen thousand acres of highly productive agricultural lands within the western San Joaquin Valley. Water rights on the San Joaquin River in the south Delta, and Central Valley Project water under contract with the Bureau of Reclamation provide the water necessary to serve the Banta-Carbona Irrigation District. These comments of the BCID are intended to supplement and add emphasis to points raised in the California Farm Water Coalition comments, Alex Hildebrand's oral and written BCID Comments

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comments, and the South Delta Water Agency's oral and written comments. The BCID comments address two issues, selection of a preferred alternative, and water storage and conveyance.

Selection of a preferred alternative. The BCID strongly encourages that CALFED stay on a schedule to develop and designate a preferred alternative by the end of 1998. The preferred alternative should include the inherent assurances provided by a Delta "common pool". Historically, some water rights holders have been able to bypass the Delta when conveying their water to their service area even though their service area lies downstream of the Delta. This has resulted in smaller flows through the Delta impacting Delta water quality and water quantity to in-Delta water users. By not having to rely on Delta water quality these entities who have gone around the Delta have had less incentive to assist in improving the Delta. Let's not make this mistake again and, when feasible, not allow water to be routed around the Delta. Thus, the preferred alternative needs to provide the certainty necessary to assure water users in the Delta that their water quality as well as quantity will not be negatively impacted. In fact, if it is CALFED's desire for everyone to get better together the preferred alternative should provide in-Delta water users with an improved water quality as well as increased flows through the Delta over pre-CALFED involvement in Delta issues.

Water Supply and Storage. The Banta-Carbona Irrigation District asserts that

additional water storage must be part of CALFED's common programs rather than variable options. CALFED's storage proposals must provide for substantial new water yield to meet the water quality and supply needs of agriculture, urban and environmental water uses upstream of the Delta, in the Delta, and in Delta export regions. The only way agriculture and area of origin water rights can be protected is to require new water demands to be met with new supplies.

Existing water users are paying or have paid for their rights to water and their facilities to distribute that water. If the citizens of the State of California and of the United States wish to have more water made available to the environment or for consumptive use, then they should develop a new supply and pay for that development. They should not "steal" water from water users who are currently putting the water to beneficial use. It is a fact of life that water is necessary for human existence and for the generation of food for that existence. So taking water from agriculture is just another means of killing someone by starvation whether it be in the United States or in another part of the world.

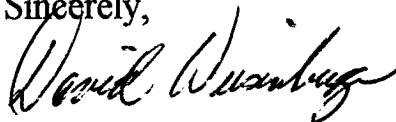
The earth's population is projected to nearly double in the next fifty years reaching ten billion by the year 2050. But there will be no increase in the land available for growing food. Some feel that the best way for nations to keep the peace is to supply people with food, not weapons. If people aren't supplied with an adequate food supply only the rich and affluent will have a means to obtain food. One in five people on this planet suffers from the ravages of hunger and poverty. Malnutrition causes more than 16 million deaths a

year. And every two and a half seconds, a child dies from malnutrition and preventable disease.

Today the State of California, the United States, and the world have the modern food systems that can help alleviate the problem of hunger. But these modern food systems will not work without an adequate and reliable supply of water. Whether you live in a city or in the country, the fact is that life everywhere is made possible by our steady, predictable supply of affordable food. The argument that taxpayers shouldn't pay for water facilities for agriculture and industry is an argument in favor paying more for food, having poor people eat less, and living precariously close to disaster when encouraging a less reliable food supply. It is a fact that since 1960 American farmers have more than doubled production to keep up with the world's food demands and they did this by using the same amount of cropland. If farmer's hadn't accomplished this feat, more than ten million square miles of land, all of it wildlife habitat, would have been lost to low-yield farming practices. That land area is almost all of the land area of Europe, the United States, and Brazil (home to rain forests). California's high yield farming provides food and fiber to the world while saving land for wildlife habitat. Thus, to deprive California farmers of water that it's entitled to is a message to us all that it isn't our desire to help alleviate hunger and malnutrition in the U.S. and the world, but that society wishes for only those with money to have food!

BCID restates that additional water storage and conveyance is a necessary component to the CALFED solution in order to protect the food supply of our children. And that the taxpayers should pay for any water storage and conveyance necessary to insure a safe, reliable food supply, as well as for environmental protection. The citizens of this State and this great nation would all be making an investment that would not only benefit them, but their children, and their children's children! The United States Congress has stated by law that water taken from agriculture shall be replaced at no cost to agriculture and CALFED needs to comply with Congress's directive. The Banta-Carbona Irrigation District strongly objects to any effort to require agricultural water users to pay any additional costs to replace water taken for environmental uses through regulatory actions, or for replacing water dedicated to environmental protection by legislative actions and the Bay-Delta Accord as well as for any new water no matter what the purpose.

Sincerely,



David K. Weisenberger
General Manager

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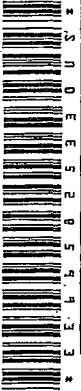
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